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Via ECF & By Email

July 22, 2020

The Honorable P. Kevin Castel
 United States District Judge
 United States Courthouse
 500 Pearl St.
 New York, NY 10007-1312

**Re: Second Application for return of passport and
 permission to return to the United Kingdom**
United States of America v. Michael Little
 Docket No. 12-cr-0647 (PKC)

Dear Judge Castel,

I respectfully write to make a second application¹ for the return of my passport and permission to travel back to my home in the United Kingdom. I apologize to the Court for unintentionally creating an impression in the first application that I could use a Court Order to suspend a detainer or deportation proceedings. I had been informed by Kimberly Ang, Pro-Consul at the British Consulate in New York in January 2020 that ICE did not intend to lodge a detainer against me. This was confirmed to me by Warden Oddo at Moshannon Valley Correction Center [MVCC] in May 2020, in preparation for my release. These communications/confirmations should have been referenced in my application.

Oral argument on my appeal [18-3622] is scheduled for September 17, 2020. ICE confirmed to me, via MVCC Administration, I will not be deported or have a detainer lodged against me prior to final judgment in my case. This was reconfirmed today in writing by a senior ICE attorney, as more fully detailed below.

Since July 14, 2020, I have lived with Tim Du Val at the above address, and reported to EDNY Probation pursuant to the conditions of my supervised release. My supervisor is USPO John Kanellopoulos who has coordinated with SDNY Sr. Deputy Chief US Probation Officer Edwin Rodriguez, Jr. I have attached as Exhibit A, a copy of an email string between Robert Culp Esq., my appellate counsel, Mr. Rodriguez, Jr. and Jeffery T. Bubier, Esq., a senior attorney with the DHS/ICE Philadelphia Office.

As detailed in the email string, Mr. Bubier confirmed I am "not subject to removal proceedings" and am "free to remain in the united states or travel abroad." Mr. Rodriguez forwarded ICE's position in respect of my requested travel to Robert Culp, Esq., my appellate counsel this morning. Mr. Rodriguez has confirmed that the decision of this Court is required for approval for international travel.

Accordingly, I renew my prayer to the Court for permission to travel to the UK as soon as possible. UK citizens returning from the US are subject to a mandatory 14-day quarantine. As my daughter Anneliese's wedding day is August 21, 2020 I ask the Court for permission to (i) travel to the UK and (ii) serve my period of supervised release in the UK, subject to conditions, including return to the US if necessary, acceptable to the Probation

*Having reviewed
 the government's
 response of July 28,
 the Court orders
 the return of Mr. Little's
 passport.
 Mr. Little may
 return and reside in
 the United Kingdom
 subject to the obligation
 to return to this District,
 if directed to do so,
 during the term of
 his supervised
 release.*

*SO
 ORDERED
 [Signature]
 USDJ
 7-28-20*

¹ First Application submitted: Dkt# 474, 6/29/2020; denied by Court Order: Dkt# 475, 7/01/2020

Service. If the Court or Probation Service requires me to return to the US for any reason during my supervised release, I will immediately comply.

EDNY Probation Service, through PO Kanellopoulos and SDNY Deputy Chief Gonzalez have indicated it takes no position on this application and defers to the decision of the Court in respect of the release of my passport and my return to the UK. As noted in the prior application, the Government, through AUSA DiMase has also indicated it takes no position on my application to return to the UK.

Respectfully submitted,

/s/ M.J. Little

Michael J. Little, Pro Se

cc: AUSA Christopher J. DiMase via ECF
Sean M. Maher, Esq. via ECF
Robert J. Culp, Esq. via email
PTO John Moscato via email
US Probation Officer [EDNY] John Kanellopoulos via email
Sr. Deputy Chief Probation Officer [SDNY] Edwin Rodriguez, Jr. via email
Supervisory Probation Officer [EDNY] Yara X. Suarez

Attachment:

Exhibit A is incorporated herein.